

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION**

**NORTH CAROLINA GROWERS' )  
ASSOCIATION, INC., )**

**Plaintiff, )**

**v. )**

**CIVIL NO. 11-198**

**HILDA SOLIS, *et al.*, )**

**Defendants. )**

**FEDERAL DEFENDANTS' SECOND CONSENT MOTION FOR EXTENSION  
OF TIME TO ANSWER PLAINTIFF'S AMENDED COMPLAINT**

Defendants Hilda Solis and the U.S. Department of Labor (Federal Defendants), by and through undersigned counsel, and pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 6.1(a), respectfully move the Court for a forty-five (45) day extension of time, until August 11, 2011, to answer or otherwise respond to Plaintiff's first amended complaint (Dkt. No. 6). On May 11, 2011, the Court granted Federal Defendants' unopposed motion for extension of time to file an answer on or before June 27, 2011. The time for responding has not yet expired.

Federal Defendants request additional time because the parties have resolved some issues raised in Plaintiff's first amended complaint, and are currently engaged in negotiations that may result in a resolution of the remaining issues. Thus, for good cause shown, Federal Defendants request an enlargement of forty-five (45) days to answer Plaintiff's first amended complaint.

Federal Defendants' counsel conferred with Plaintiff's counsel regarding this request. Plaintiff's counsel consented to a forty-five (45) day extension of time, or until August 11, 2011, for Federal Defendants to answer or otherwise respond to Plaintiff's first amended complaint.

Respectfully submitted,

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By: /s/ Geoffrey Forney  
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Dated: June 21, 2011

**CERTIFICATE OF SERVICE**

I hereby certify that on June 21, 2011, I electronically filed the foregoing  
FEDERAL DEFENDANTS' SECOND CONSENT MOTION FOR EXTENSION OF  
TIME TO ANSWER PLAINTIFF'S AMENDED COMPLAINT with the Clerk of Court  
by using the CM/ECF system, which will provide electronic notice and a hyperlink to this  
document to the following attorneys of record:

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